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9
10 **IN THE UNITED STATES DISTRICT COURT FOR THE**
11 **NORTHERN MARIANA ISLANDS**

12 **DONGBU INSURANCE COMPANY,**
13 **LTD.,**

14 **Plaintiff,**

15 **v.**

16 **OKP (CNMI) CORPORATION and**
17 **JOAQUIN Q. ATALIG,**

18 **Defendants.**

Civil Action No. 08-0002

DECLARATION OF
TAMARA L. HUNTER
(June 25, 2008)

Notice of Hearing:
July 10, 2008
1:30 p.m.

19 I, TAMARA L. HUNTER, state as follows:

- 20 1. I am the branch manager of Moylan's Insurance Underwriters, Intl. Saipan office
21 ("Moylan's") and I have held this position continuously since 1999.
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23 2. I am over the age of eighteen years and competent to make this Declaration. I make
24 the following statements based on personal knowledge unless specifically indicated
25 otherwise below.
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27 3. Moylan's is the authorized general agent for Dongbu Insurance Company, Ltd.
28 ("Dongbu") and was throughout the years 2005 and 2006.

- 1 4. As the branch manager of Moylan's Saipan office, I am the custodian of records for
2 Dongbu insurance policies issued through the Saipan office of Moylan's, or in other
3 words, I am responsible to maintain Moylan's records of Dongbu insurance policies
4 issued through the Saipan office of Moylan's.
- 5 5. As the general agent for Dongbu, it is the regular conducted business activity and
6 regular practice of Moylan's to issue Dongbu's insurance policies to various
7 insureds on Saipan, and then to maintain copies of those policies in our Saipan
8 office.
- 9 6. Attached hereto as **Exhibit A** is a true and correct copy of Dongbu Contractors' All
10 Risk Policy, KMCR0015-S00 (the "CAR policy"), which was issued on January 19,
11 2006 from Dongbu, through Moylan's, to the named insured OKP (CNMI)
12 Corporation ("OKP"). The CAR policy consists of a total of twenty-four pages
13 (bates numbers 000001-000024). The twenty-four pages include a cover page
14 (000001), two pages of declarations (000002-000003), thirteen pages of
15 endorsements (000004-000016), and then the eight page "Munich Re's CAR Policy
16 Form" (000017-000024).
- 17 7. Attached hereto as **Exhibit B** is a true and correct copy of Dongbu Automobile
18 Liability Policy, 150230-150230 (KMA-09102-S00) (the "Auto policy"), which was
19 issued on December 27, 2005 from Dongbu, through Moylan's, to the named
20 insured OKP. The Auto policy consists of a total of thirty-seven pages (bates
21 numbers 000025-000061). The thirty-seven pages include one page of declarations
22 (000025), a sixteen page schedule of vehicles (000026-000041), two pages setting
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1 forth an additional endorsement and an additional exclusion (000042-000043), and
2 an eighteen page Automobile policy form (000044-000061).

3 8. My signature appears where indicated for Moylan's as the general agent for Dongbu
4 on the various declarations, endorsements and exclusions pages on the CAR policy
5 and the Auto policy, and I hereby affirm that I signed where indicated, thereby
6 issuing the policies as specified therein.

7
8 9. The CAR policy and the Auto policy were issued and maintained by Moylan's in the
9 course of Moylan's regularly conducted business and regular practice.

10 I declare under penalty of perjury that the foregoing is true and correct. Signed this 25th day
11 of June, 2008 on Saipan, Commonwealth of the Northern Mariana Islands.

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TAMARA L. HUNTER